

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO  
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY  
(NPMHU/USPS-T4—3)  
(March 12, 2012)**

The United States Postal Service provides the response of witness Neri (USPS-T-4) to the above-listed interrogatory of the National Postal Mail Handlers Union, dated January 17, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno  
Chief Counsel  
Global Business & Service Development

James M. Mecone

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260  
(202) 268-6525; Fax -5402  
March 12, 2012

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY

**NPMHU/USPS-T4—3** Out of the AMP studies done to date, what number and percentage have resulted in a decision not to consolidate or to halt, terminate, withdraw or hold in abeyance the study?

**RESPONSE:**

From 2008 to the present, we issued public notice of intent to conduct 400 AMP studies, but in 40 of those instances (10 percent), there was not a decision to implement the proposal.